

December 30, 2008

Via Electronic Filing
Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Federal-State Joint Board on Universal Service, CC Doc. No. 96-45; and High-Cost Universal Service Support, WC Docket No. 05-337

Dear Ms. Dortch:

Sagebrush Cellular, Inc. ("Sagebrush") respectfully responds to the Public Notice issued on December 10, 2008, and designated DA 08-2684 in the above-referenced proceedings (the "Notice"). The Notice encourages competitive eligible telecommunications carriers (ETCs) to confirm their March 2008 high-cost support amount information with the Universal Service Administrative Company (USAC) and file any corrections on or before December 31, 2008.

The Notice was issued in the context of the Commission's May 1, 2008 Interim Cap Order decision to establish an interim, emergency cap on the amount of universal service high-cost support that competitive ETCs, including Sagebrush, may receive. In accordance with the Interim Cap Order, the competitive ETC support for each state is capped, on an annualized basis, at the level of support that each competitive ETC in a state was eligible to receive during March 2008.

Sagebrush has, accordingly, reviewed the information regarding its March 2008 high-cost support. While the numbers indicated on the USAC website indicating the high-cost support distributed to Sagebrush are technically correct, Sagebrush respectfully notes that these numbers do not reflect the fact that Sagebrush serves two tribal reservations that constitute Covered Locations pursuant to the *Interim Cap Order*.

Accordingly, Sagebrush qualifies for, and formally elects, to utilize this limited exception to the interim cap established in the *Interim Cap Order*. We have been advised by staff at USAC that a formal election methodology for this exception has not yet been released, so we are filing our December 30th Form 525 with total number of lines in service, and we are providing USAC with the number of qualified residential accounts served on the Tribal Lands (Fort Peck and Crow Reservations) in our study areas, via a letter. As of June 30th, 2008 (numbers represented on 12/30/08 Form 525), Sagebrush serves 4,834 qualifying residential accounts located on tribal lands constituting Covered Locations as defined in the *Interim Cap Order*, that should be an exception from the interim cap. This is out of a total of 11,564 lines reported on the Sagebrush Form 525 for

Marlene H. Dortch, Secretary Page 2

Montana. Our understanding is that this means that 4,834 will be excepted and treated under the former identical support rule methodology, while 6,730 (11,564-4,834=6,730) will be treated under USAC's interim cap methodology. Sagebrush is exploring and analyzing its embedded costs for purposes of potentially filing cost study support that would exempt all of its lines from the interim cap, but we understand that a filing of this type would first require state Public Service Commission approval.

Sagebrush understands that the Notice was provided to reflect the Commission's intent, to the extent possible, "[t]o provide certainty regarding the amount of high-cost support available to competitive ETCs under the cap in each state." Accordingly, Sagebrush provides this information to ensure that both the Commission and USAC are aware that the high-cost support available to Sagebrush is, in accordance with the limited Covered Location exception set forth in the *Interim Cap Order*, subject to adjustment from the amount of high-cost support Sagebrush received in March 2008.¹

Please direct any questions regarding this matter to the undersigned.

Shown Hansin

Shawn Hanson Sagebrush GM

Cc: Karen Majcher, USAC Vice President, High Cost & Low Income Division
Jennifer McKee, Acting Division Chief, FCC Telecommunications Access Policy Division,
Wireline Competition Bureau

In addition, Sagebrush respectfully notes that it has not waived its right, as established by the *Interim Cap Order*, to determine subsequently the amount of high-cost support it receives on the basis of the submission of its own costs.



d/b/a **Nemont**

December 29, 2008

Via Overnight Delivery
Karen Majcher, Vice President
High Cost & Low Income Division
Universal Service Administrative Company
2000 L Street, N.W., Suite 200
Washington, D.C. 20036

Re: Federal-State Joint Board on Universal Service, CC Doc. No. 96-45; and High-Cost Universal Service Support, WC Docket No. 05-337

Dear Ms. Majcher:

Sagebrush Cellular, Inc. ("Sagebrush") respectfully responds to the Public Notice issued on December 10, 2008, and designated DA 08-2684 in the above-referenced proceedings (the "Notice"). The Notice encourages competitive eligible telecommunications carriers (ETCs) to confirm their March 2008 high-cost support amount information with the Universal Service Administrative Company (USAC) and file any corrections on or before December 31, 2008.

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Sagebrush has, accordingly, reviewed the information regarding its March 2008 high-cost support. While the numbers indicated on the USAC website indicating the high-cost support distributed to Sagebrush are technically correct for March 2008, Sagebrush respectfully notes that these numbers do not reflect the fact that Sagebrush serves two tribal reservations that constitute Covered Locations pursuant to the *Interim Cap Order*.

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Karen Majcher, USAC Vice President Page 2

identical support rule methodology, while 6,730 (11,564-4,834=6,730) will be treated under USAC's interim cap methodology. Sagebrush is exploring and analyzing its embedded costs for purposes of potentially filing cost study support that would exempt all of its lines from the interim cap, but we understand that a filing of this type would first require state Public Service Commission approval.

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Please direct any questions regarding this matter to the undersigned.

Sincerely.

Shawn Hanson Sagebrush GM

Cc: Jennifer McKee, Acting Division Chief, FCC Telecommunications Access Policy Division, Wireline Competition Bureau CETCCap@USAC.Org

In addition, Sagebrush respectfully notes that it has not walved its right, as established by the *Interim Cap Order*, to determine subsequently the amount of high-cost support it receives on the basis of the submission of its own costs.

FCC Form 525 High Cost Support Mechanism Competitive Carrier Line Count Report

FCC Form 525 OMB Control No. 3060-0986 January 2005

COMPETITIVE CARRIERS HIGH COST DATA SUBMISSION

(1) Quarterly Sportssion Date:	12/29/2008]		
(2) USAC Service Provider Identification Nu	mber(SPIN)		143000729	Do Not Write in this Area; For Administrator's Use Only
(3) Company Study Area Code 2 (Fistime file	steate bankapa alsuty area Codewill be asscred.		489006]
(4) Stuly Area Name)	Sagebr	ush Cellular, Inc.		
(5) Company Legal Name Sage	brush Cellular, Inc.			
Check Box if this is a new address/contact from	m a previous data submission:	<u> X </u>		1
(7) Mailing Address:	PO Box 600, S	Scobey, MT 59263-0600		1
(8)ContactName.	Aimee Dietrich	9) 1/16	Finance/Accounting Supervisor	
(10) releptione Number:	4	06-783 -2225		
(11) E-mail Address:	<u></u>	noostliptish@remont.cose		

(12) Mechanism for which you are requesting support:	(13) Lines Reported as of:	(14) Type Original	of Filing (45). Worksheet to Complete
High Cost Loop Support (HCL)	6/30/2008	х	Complete HCL and LSS
Local Switching Support (LSS)	6/30/2008	х	Complete HCL and LSS
Interstate Common Line Support (ICLS)	6/30/2008	х	Complete ICLS Worksheet
High Cost Model Support (HCM)			Complete HCM Worksheet
Interstate Access Support (IAS)			Complete IAS Worksheet

HIGH COST LOOP (HCL) AND LOCAL SWITCHING SUPPORT (LSS) LINE COUNT WORKSHEET

ZUBSAS Service Provider Identification Number (SPIN)			3000729				Do Not Write in this Area: For Administrator's Use Only
(2) BSAC Service Provider Identification Number (SPIN):	489006						
(1) Study A cal Name (13) Lines Reported as of	Sägebrush Cellular, Inc.						
(13) Lines Reported as of			/30/2008				
		ORIG	INAL				
Line Count Date for Date of 2.2.7 Country							
Line Count Data for Path 1, 2 & 3 Carriers Where carrier reports both UNEs and facilities based lines in the same SA	C or disaggregation	on zone, carrier	shall list UNEs	in a separate row.			
Complete one row for each disaggregation zone.							(23) Were any lines provided through UNES?
(15) Inclumbent Carries Name	(17) incumbent	(18)ETC	(19) Path	(20) Disaggregation Zone Name	(21) Wire Corter CLU Code	(22) Total Number of	(23) Were any lines provided through UNES? If yes, please fill out the UNE Agreement Information
main management came name in the state of th	Camer SAC	Liesignation	Designation	Zone Name ()	121 Wire Center CLUI Code	Lines in Service	Information.
Nemant Telephone Cooperative, Inc.	482247	Yes	Path_1			9966	No
Project Telephone Company	482250	Yes	Path 1			1598	No
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FCC Form 525 High Cost Support Mechanism Competitive Carrier Line Count Report

INTERSTATE COMMON LINE SUPPORT (ICLS) LINE COUNT WORKSHEET

USAC Service Provider Demonstration Number (\$11)			143000728				Do Not Write in For Administrate	
Company Stray Area Code			489006					
Company Study Area Code Study Area Name:		Sage	brush Cellular, Inc.					
a) Lines reported as of the All Type of Fling:			6/30/2008					
4) Type of Fling			ORIGINAL					
								•
ine Count Data for Path 1, 2 & 3 Carriers			<u> </u>					
omplete one row for each disaggregation zone.	(25) Incumbent			(28) Disaggregation				(32) Total Number
(24) Incumbent Carrier Name	(25) Incumbent Carrier SAC	(26) ETC Designation	(27) Path Designation	((28) Disaggregation Zone Name	(29) Wire Center CLLI Code	(30) Residence & Single Line Business	(31) Multi-line Business	(32) Total Number Lines in Service
amont Telephone Cooperative, Inc.	482247	Yes	Path 1			9966		9966
roject Telephone Company	482250	Yes	Path 1	{		1598		1596
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FCC Form 525 High Cost Mechanism Competitive Carrier Line Count Report

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING FCC FORM 525 ON ITS OWN BEHALF:

Certification of Officer or Employee as to the Accuracy of the Data Reported in FCC Form 525, Line Count Report for Competitive Carriers, on Behalf of Reporting Carrier							
ł certify that i am an officer or employee of the reporting carrier; my responsibilities include ensuring the accuracy Form 525; and, to the best of my knowledge, the information reported on this form is accurate.	of the actual line count data reported on FCC						
Name of Reporting Carrier: Sagebrush Celiular, Inc.							
Service Provider Identification Number. 143000729							
Signature of authorized officer or employee: Shawn Acusson	Date: 12/29/2008						
Printed name of authorized officer or employee: Shawn Hanson							
Title or position of authorized officer or employee: General Manager							
Telephone number of authorized officer or employee: (406) 783-2200 ext.							
Study Area Code of Reporting CETC 489006 [mm/dd/yyyy]	12/30/2008						
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.							

COMPETITIVE CARRIERS HIGH COST DATA SUBMISSION

(1) Quarterly Submission Date:	12/29/2008]		
(2) USAC Service Provider Identification No	imber (SPIN):		143000729	Do Not Write in this Area: For Administrator's Use Only
(3) Company Study Area Code: (Crs. line file	rs leave Denk and al-Study Area Coolewill be essigned.		389013]
(4) Study Area Name	Sagebr	rush Cellular, Inc.		7
(5) Company Legal Name Sage	ebrush Cellular, Inc.	man ja]
		80527	2	<u> </u>
Check Box if this is a new address/contact fro	in a previous data southission.	<u></u>		7
	PO Box 600, 8	Scobey, MT 59263-0600		
(8) Contact Name.	Aimee Dietrich	(9) Title	Finance/Accounting Supervisor	
((0) Telephone Number	4(06-783-2225		
(11) E-mait Address	alm	ter delica Cremon Core		

(1,2) Mechanism for which you are requesting support	(13) Lines Reported as of	(14) Type Original	of Filing (15) Worksheet to Complete Brevision
High Cost Loop Support (HCL)	6/30/2008	x	Complete HCL and LSS
Local Switching Support (LSS)	6/30/2008	х	Complete HCL and LSS
Interstate Common Line Support (ICLS)	6/30/2008	x	Complete ICLS Worksheet
High Cost Model Support (HCM)			Complete HCM Worksheet
Interstate Access Support (IAS)			Complete IAS Worksheet

HIGH COST LOOP (HCL) AND LOCAL SWITCHING SUPPORT (LSS) LINE COUNT WORKSHEET

(3) USAC Service Provider Identification Number (SPIN): (3) Company Study Area Code:			3000729				Do Not Write in this Area: For Administrator's Use Only
(a) Company Study Ares Code	369013						
(3) Study Area Name: (13) Lines Reported as of:	Sagebrush Cellular, Inc.						
(33) Lines Reported as of:			30/2008				
(A) preoficials		ORIG	INAL				
Line Count Data for Path 1, 2 & 3 Carriers		<u> </u>					
Where carrier reports both UNEs and facilities based lines in the same SA Complete one row for each disaggregation zone.	C or disaggregation	n zone, carrier	shall list UNEs	in a separate row.			
							(23) Were any lines provided through UNEsz
[15] Incumbent Carrier Name	(17) Incumbent Carner SAC	(18) ETC Cesignation	(19) Path Designation	(20) Disaggregation Zone Name	(21) Wire Center CLU Code	(22) Total Number of Lines in Service	if yes, please fill out the UNE Agreement :
Nemont Telephone Cooperative, Inc.	382247		Path 1			38	No
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FCC Form 525 High Cost Support Mechanism Competitive Carrier Line Count Report

INTERSTATE COMMON LINE SUPPORT (ICLS) LINE COUNT WORKSHEET

(2) USAC Service Provider Identification Number (SPR)): (3) Company Study Area Code:			143000729				Do Not Write in For Administrati	
GyCompany Study Area Code:		-	389013					
(4) Shudy Arce (Name: (13) Lines Reported as (7)		Sage	orush Cellular, Inc.					
(13) Lines Reported as of			6/30/2008					ľ
(14) Type of Fling			ORIGINAL					
Line Count Data for Path 1, 2 & 3 Carriers Complete one row for each disaggregation zone.						_		
(24) Hicumbent Carrier Name	(25) Incumbent Carrier SAC	(26) ETC Designation	[27] Path Designation	(28) Disaggregation Zone Name	(29) Wire Center CLLL Code	(30) Residence & Single Line Business	(31) Multi-line Business	(32) Total Number of Lines in Service
Nemont Telephone Cooperative, Inc.	382247	Yes	Path 1			249		249
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FCC Form 525 High Cost Mechanism Competitive Carrier Line Count Report

FCC Form 525 OMB Control No. 3060-0986 January 2005

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING FCC FORM 525 ON ITS OWN BEHALF:

Certification of Officer or Employee as to the Accuracy of the Data Reported in FCC Form 525, Behalf of Reporting Carrier	Line Count Report for Competitive Carriers, on
I certify that I am an officer or employee of the reporting carrier; my responsibilities include ensuring the acc Form 525; and, to the best of my knowledge, the information reported on this form is accurate.	uracy of the actual line count data reported on FCC
Name of Reporting Camer: Sagebrush Cellular, Inc.	
Service Provider Identification Number: 143000729	
Signature of authorized officer or employee: Islaum Honsein	Date: 12/29/2008
Printed name of authorized officer or employee: Shawn Hanson	
Title or position of authorized officer or employee: General Manager	
Telephone number of authorized officer or employee: (406) 783-2200 ext.	
Study Area Code of Reporting CETC 389013 Filing Due Date for this form	12/30/2008
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communicati imprisonment under Title 18 of the United States Code, 18 U.S.C. §	ons Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or